



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Registration Division (7505P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

59639-199

Date of Issuance:

9/30/16

NOTICE OF PESTICIDE:

Registration  
 Reregistration  
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

S-2200 4 SC VPP Fungicide

Name and Address of Registrant (include ZIP Code):

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Senior Regulatory Scientist  
Valent U.S.A. Corporation  
1600 Riviera Ave, Suite 200  
Walnut Creek, CA 94596-8025

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(C). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Rachel C. Holloman, Chief  
Fungicide and Herbicide Branch,  
Registration Division (7505P)

Date:

9/30/16

2. You are required to submit to the Agency the Tier 1 studies listed below. Your failure to provide these data in a timely or adequate manner may result in initiation of a cancellation action against your registration.
  - Chronic oral toxicity to adult honey bees (Non-Guideline Study; Draft test protocols are currently being finalized through the OECD).
  - Chronic oral toxicity to larval honey bees (Non-Guideline Study; Draft test protocols are currently being finalized through the OECD).
3. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
4. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, "EPA Reg. No. 59639-199."
5. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 8/5/2013
- Alternate CSF dated 8/6/2013

If you have any questions, please contact Aswathy Balan by phone at 703-347-0510, or via email at [balan.aswathy@epa.gov](mailto:balan.aswathy@epa.gov).



GROUP 11 FUNGICIDE

# S-2200 4 SC VPP Fungicide

## Turfgrass Fungicide

A SYSTEMIC FUNGICIDE FOR CONTROL OF CERTAIN TURFGRASS DISEASES

Active Ingredient	By Wt
Mandestrobin* .....	43.4%
Other Ingredients .....	<u>56.6%</u>
Total	100.0%

\*(*RS*)-2-methoxy-*N*-methyl-2-[ $\alpha$ -(2,5-xylyloxy)-*o*-tolyl]acetamide

S-2200 4 SC VPP Fungicide is a suspension concentrate containing 4 lb active ingredient per gallon.

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

**SEE NEXT PAGE FOR ADDITIONAL PRECAUTIONARY STATEMENTS.**

**NET CONTENTS**

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS & DOMESTIC ANIMALS**  
**CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

<b>FIRST AID</b>	
<b>If swallowed:</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by a poison control center or doctor.</li><li>• Do not give anything to an unconscious person.</li></ul>
<b>HOT LINE NUMBER</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 800-892-0099 for emergency medical treatment information.	

**PERSONAL PROTECTIVE EQUIPMENT (PPE):**

**Applicators and other handlers must wear:** long-sleeved shirt and long pants, chemical-resistant gloves made of any waterproof material, socks and shoes.

Follow the manufacturer’s instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

<b>USER SAFETY RECOMMENDATIONS</b>
Users should: <ul style="list-style-type: none"><li>• Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.</li><li>• Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.</li><li>• Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.</li></ul>

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to aquatic organisms. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposing of equipment washwaters or rinsate. Drift and runoff from treated areas may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff may be reduced by including a vegetative strip between the treated area and the edge of the water body.

## **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.**

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### **AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is coveralls, chemical-resistant gloves made of any waterproof material, socks and shoes.

### **NON-AGRICULTURAL USE REQUIREMENTS**

The requirements in this box apply to the uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, greenhouses or sodfarms.

Keep all unprotected persons out of operating areas or vicinity where there may be drift.

Do not enter or allow others to enter treated areas until sprays have dried.

**DISCLAIMER, RISKS OF USING THIS PRODUCT,  
LIMITED WARRANTY  
AND LIMITATION OF LIABILITY**

**IMPORTANT: Read the entire Label including this Disclaimer, Risks of Using this Product, Limited Warranty, and Limitation of Liability before using this product. If the terms are not acceptable THEN DO NOT USE THE PRODUCT; rather, return the unopened product within 15 days of purchase for a refund of the purchase price.**

**RISKS OF USING THIS PRODUCT**

The Buyer and User (referred to collectively herein as "Buyer") of this product should be aware that there are inherent unintended risks associated with the use of this product which are impossible to eliminate. These risks include, but are not limited to, injury to plants and crops to which this product is applied, lack of control of the target pests or weeds, resistance of the target pest or weeds to this product. Such risks of crop injury, non-performance, resistance or other unintended consequences are unavoidable and may result because of such factors as weather, soil conditions, disease, moisture conditions, irrigation practices, condition of the crop at the time of application, presence of other materials either applied in the tank mix with this product or prior to application of this product, cultural practices or the manner of use or application, (or a combination of such factors) all of which are factors beyond the control of Valent. The Buyer should be aware that these inherent unintended risks may reduce the harvested yield of the crop in all or a portion of the treated acreage, or otherwise affect the crop such that additional care, treatment and expense are required to take the crop to harvest. If the Buyer chooses not to accept these risks, THEN THIS PRODUCT SHOULD NOT BE APPLIED. By applying this product Buyer acknowledges and accepts these inherent unintended risks AND AGREES THAT TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, RISKS ASSOCIATED WITH THE APPLICATION AND USE ARE ASSUMED BY THE BUYER.

To the extent consistent with applicable law, Valent shall not be responsible for losses or damages (including, but not limited to, loss of yield, increased expenses of farming the crop or such incidental, consequential or special damages that may be claimed) resulting from use of this product in any manner not set forth on the label. To the extent consistent with applicable law, Buyer assumes all risks associated with the use of this product in any manner or under conditions not specifically directed or approved on the label.

**LIMITED WARRANTY**

Valent warrants only that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the label, under average use conditions, when used strictly in accordance with the label **and subject to the Risks of Using This Product as described above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, EXCEPT AS SET FORTH ABOVE, VALENT MAKES NO OTHER WARRANTIES, EITHER EXPRESSED OR IMPLIED.** No agent or representative of Valent or Seller is authorized to make or create any other express or implied warranty.

**LIMITATION OF LIABILITY**

**To the extent consistent with applicable law, Valent or Seller shall not be liable for any incidental, consequential, indirect or special damages resulting from the use or handling of this product. The limitation includes, but is not limited to, loss of yield on all or any portion of the treated acreage, increased care, treatment or other expenses required to take the crop to harvest, increased finance charges or altered finance ratings, emotional or mental distress and/or exemplary damages. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE BUYER, AND THE EXCLUSIVE MAXIMUM LIABILITY OF VALENT OR SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THIS PRODUCT OR, AT THE ELECTION OF VALENT OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

**PROMPT NOTICE OF CLAIM**

Valent must be provided notice as soon as Buyer has reason to believe it may have a claim, but in no event later than twenty-one days from date of planting, or twenty-one days from the date of application, whichever is latter, so that an immediate inspection of the affected property and growing crops can be made.

To the extent consistent with applicable law, if Buyer does not notify Valent of any claims, in such period, it shall be barred from obtaining any remedy.

**NO AMENDMENTS**

Valent and Seller offer this product, and Buyer accepts it, subject to the foregoing Disclaimer, Risks of Using This Product, Limited Warranty and Limitation of Liability, which may not be modified by any oral or written agreement.

**TANK MIX**

NOTICE: Tank mixing or use of this product with any other product which is not specifically and expressly authorized by the label shall be the exclusive risk of user, applicator and/or application advisor, consistent with applicable law.

**Read and follow the entire label of each product to be used in the tank mix with this product.**

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## PRODUCT INFORMATION

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S-2200 4 SC VPP Fungicide is a broad spectrum fungicide for control of certain diseases in turfgrass. S-2200 4 SC VPP Fungicide has preventive, curative and systemic properties. S-2200 4 SC VPP Fungicide can be applied pre- or post- infection, but is most effective when applied prior to infection. Optimal disease control is achieved when S-2200 4 SC VPP Fungicide is applied in a regularly scheduled spray program used in combination and/or rotation with other effective fungicides that have different modes of action and are effective against the same target pathogen(s).

### MODE OF ACTION

S-2200 4 SC VPP Fungicide belongs to the strobilurin or Quinone Outside Inhibitors (QOI) class (Group 11) of fungicides as classified by the Fungicide Resistance Action Committee (FRAC).

### PRECAUTION

Always mix product thoroughly before use.

### RESISTANCE MANAGEMENT

S-2200 4 SC VPP Fungicide (Group 11) is effective against pathogens which are resistant to fungicides with modes of action different from those of fungicide Group 11. Fungal isolates resistant to mandestrobin may eventually dominate the fungal population if used repeatedly at the same site or in successive years as the primary method of control for the targeted pathogen species. Selection for resistance may be particularly rapid if resistance to Group 11 fungicides is already present in the pathogen population. This may result in reduced disease control by S-2200 4 SC VPP Fungicide or other Group 11 fungicides. To maintain the performance of S-2200 4 SC VPP Fungicide in the field, do not exceed two sequential applications or the total number of yearly applications of S-2200 4 SC VPP Fungicide as stated in *TURFGRASS – Specific Diseases, Rates, Timings and Application Information* table. Adhere to the label instructions regarding the consecutive uses of S-2200 4 SC VPP Fungicide or other Group 11 fungicides on the same pathogens. The following recommendations may be considered to further delay the development of Group 11 fungicide resistance:

1. **Tank Mixtures:** Use tank mixtures with effective fungicides from different modes of action groups that are registered and/or permitted for the same use and that are effective against the pathogens of concern. Valent recommends using at least the minimum labeled rates of each fungicide in the tank mix. Do not tank mix with any product which contains a prohibition on tank mixing. Follow the more restrictive labeling of any tank mix partner.
2. **Integrated Pest Management (IPM):** S-2200 4 SC VPP Fungicide should be integrated into an overall disease and pest management program. Cultural practices known to reduce disease development should be followed. Consult your local extension specialist, certified crop advisor and/or Valent representative for additional IPM strategies established for your area. S-2200 4 SC VPP Fungicide may be used in advisory (disease forecasting) programs, which recommend application timing based on environmental factors favorable for disease development.
3. **Monitoring:** Monitor efficacy of all fungicides used in the disease management program against the targeted pathogen and record other factors that may influence fungicide performance and/or disease development.

4. **Reporting:** Contacting your local extension specialist, certified crop advisors and/or manufacturer for fungicide resistance management and/or integrated pest management recommendations for specific crops and resistant pathogen biotypes.

For further information or to report suspected resistance, you may contact Valent U.S.A. Corporation at the following toll-free number: 800-898-2536.

### **RAINFASTNESS**

S-2200 4 SC VPP Fungicide is rainfast 2 hours after application. Applications should not be made if rain is expected within 2 hours of application or disease control may be reduced.

### **JAR TEST TO DETERMINE COMPATIBILITY OF ADJUVANTS AND S-2200 4 SC VPP FUNGICIDE**

A jar test should be performed before mixing commercial quantities of S-2200 4 SC VPP Fungicide, when using this product for the first time, when using new adjuvants, when using new tank mixes, or when using a new water source.

1. Add 1 pt of the water to a quart jar. The water should be from the same source and temperature as that to be used in the spray tank mixing operation.
2. Add 2 g of S-2200 4 SC VPP Fungicide to the quart jar, gently mix until product goes into suspension.
3. Add 1 ml of new adjuvant or and/or appropriate amount of new tank mix partner and gently mix.
4. Place cap on jar, invert 10 times, let stand for 15 minutes, evaluate.
5. An acceptable tank mix combination will have a smooth, uniform appearance. If any of the following conditions are observed, the choice of spray mix components should be questioned:
  - a) Layer of oil or globules on the mixture's surface.
  - b) Flocculation: formation of fluffy, cloudlike aggregates or masses in suspension or as a layer on the bottom of the jar.
  - c) Clabbering: thickening texture (coagulated) like gelatin or cottage cheese.

### **SPRAYER PREPARATION**

Before applying S-2200 4 SC VPP Fungicide, start with clean, well maintained application equipment. The spray tank hoses and booms must be cleaned to ensure no residue from previous spraying operations remains in the sprayer. The spray equipment must be cleaned according to the manufacturer's directions for the last product used before the equipment is used to apply S-2200 4 SC VPP Fungicide. If two or more products were tank mixed prior to S-2200 4 SC VPP Fungicide application, the most restrictive cleanup procedure must be followed.

### **APPLICATION EQUIPMENT**

Application equipment must be clean and in good repair. Check nozzles frequently for accuracy.

### **SPRAYER CLEANUP**

Clean sprayer equipment each day following S-2200 4 SC VPP Fungicide application. After application is complete, use the following steps to clean spray equipment:

1. Completely drain the spray tank, rinse the sprayer thoroughly, including the inside and outside of the tank and all in-line screens.
2. Fill the spray tank with clean water and flush all hoses, booms, screens and nozzles.
3. Drain tank completely.
4. Remove all nozzles and screens and rinse them in clean water.

## **MIXING INSTRUCTIONS**

1. Fill clean spray tank 1/2 to 2/3 of desired level with clean water.
2. While agitating, slowly add the S-2200 4 SC VPP Fungicide to the spray tank. Agitate to create a rippling or rolling action on the water surface.
3. If tank mixing S-2200 4 SC VPP Fungicide with other labeled pesticides, add water soluble bags first, followed by dry formulations, flowables, emulsifiable concentrates and then solutions.
4. Add any required adjuvants.
5. Fill spray tank to desired level with water. Continue agitation until all spray solution has been applied.
6. Mix only the amount of spray solution that can be applied the day of mixing. Apply S-2200 4 SC VPP Fungicide within 24 hours of mixing.

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## **TURFGRASS**

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### **RECOMMENDED TURFGRASS SPECIES**

Annual Bluegrass  
Bentgrass  
Bermudagrass  
Centipedegrass  
Fescue  
Kentucky Bluegrass  
Perennial Ryegrass  
Zoysia

### **USE SITES**

S-2200 4 SC VPP Fungicide may be used for disease control on turfgrass in golf courses, lawns and turfgrass in landscape areas around residential, institutional, public, commercial and industrial buildings, parks, recreational areas, athletic fields and sod farms.

### **SPECIAL INSTRUCTIONS**

- Use S-2200 4 SC VPP Fungicide in conjunction with turf management practices that promote good plant health and optimum disease control. Proper identification of disease infestations is essential for providing control. Consult diagnostic guides, kits or other means of identification to determine the best control measures.
- S-2200 4 SC VPP Fungicide is more effective when used preventively or early in disease development. Length of disease control will vary according to local environmental conditions, disease pressure and turfgrass management practices.
- Apply to dry turf or after mowing. For control of foliar diseases, allow turf to dry before irrigation. For control of soil borne diseases, S-2200 4 SC VPP Fungicide can be watered in immediately after application or applied with a high volume of water.
- S-2200 4 SC VPP Fungicide may be tank mixed with other registered turfgrass fungicides. Perform a jar test as describe above to determine compatibility before making applications. Directions for use of S-2200 4 SC VPP Fungicide have been developed using no adjuvant in the spray solution.

- Important: Under conditions of optimal disease development (such as high humidity and temperature), use higher labeled rates and shorter application intervals. When applications are made curatively, use higher rates of S-2200 4 SC VPP Fungicide and shorter application intervals. Use higher application rate in areas with a history of severe disease pressure.
- Failure to follow label directions may result in turfgrass injury and/or inferior disease control.

### **APPLICATION DIRECTIONS**

Apply S-2200 4 SC VPP Fungicide using standard, low-pressure spray equipment designed to deliver coarse to medium size spray droplets (do not use nozzles designed to deliver fine droplets). Apply in a sufficient volume of water to provide thorough spray coverage and a uniform spray pattern. Do not position the spray boom more than 20 inches above the turf. For foliar disease, apply 2 gal of spray solution per 1,000 sq ft. For crown and root diseases, apply 2 to 4 gal of spray solution per 1,000 sq ft. For spot treatment, mix 0.1 to 0.2 fl oz of S-2200 4 SC VPP Fungicide per gallon of water.

### **TURFGRASS TOLERANCE**

Due to the large number of turfgrass types, possible tank mixes and application techniques, it has not been determined if S-2200 4 SC VPP Fungicide can be safely used on all turfgrasses under all conditions. Before making a large scale application, determine safety in a small test area. Monitor the test area for at least 2 weeks to determine safety under local growing conditions.

### **RESTRICTIONS**

- Do not apply more than 54 fl oz (1.68 lb ai) of S-2200 4 SC VPP Fungicide per acre per year.
- Do not apply through any type of irrigation system.
- Do not apply by aerial application.
- Do not graze animals on treated areas for one year after application.
- Do not feed clippings from treated areas to livestock or poultry.
- Do not apply more than 13.5 fl oz (0.42 lb ai) of S-2200 4 SC VPP Fungicide per acre per application.

### TURFGRASS – Specific Diseases, Rates, Timings and Application Information

Diseases ( <i>Pathogens</i> )	Application Rates		Application Interval/ Timing	Special Instructions
	fl oz/1,000 sq ft	fl oz/A		
Dollar Spot ( <i>Sclerotinia homoeocarpa</i> )	0.17 to 0.31	7.4 to 13.5	14 to 21 days	Use preventively. Begin application when conditions favor disease development.  Do not make more than 2 S-2200 4 SC VPP Fungicide applications without alternating to a non-Group 11 fungicide for resistance management.
Brown Patch ( <i>Rhizoctonia solani</i> ) (suppression only) Fairy Ring ( <i>various Basidiomycetes</i> ) Rust Diseases ( <i>Puccinia spp.</i> )  Take-all Patch ( <i>Gaeumannomyces graminis</i> )	0.31	13.5	14 days	Begin applications when conditions favor disease development or when the disease first appears.  Do not make more than 2 S-2200 4 SC VPP Fungicide applications without alternating to a non-Group 11 fungicide for resistance management.

fl oz product/1000 sq ft	fl oz product/acre	lb ai/acre	Maximum Applications per year
0.17	7.4	0.23	4
0.25	10.9	0.34	4
0.275	12	0.375	4
0.31	13.5	0.42	4

## STORAGE AND DISPOSAL

### PESTICIDE STORAGE

Store in a cool dry place.

Keep pesticide in original container.

Keep container closed when not in use.

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.

Do not put dilute into food or drink containers.

Do not store in or around the home.

For help with any spill, leak, fire or exposure involving this material, call day or night 800-892-0099.

### PESTICIDE DISPOSAL

Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER HANDLING

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available, or dispose in a sanitary landfill or incinerate.

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Manufactured for:

Valent U.S.A. Corporation

P.O. Box 8025

Walnut Creek, CA 94596-8025

Made in U.S.A.

EPA Reg. No. 59639-ROO

EPA Est.

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